

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**GEORGIA-PACIFIC CONSUMER)
PRODUCTS LP,)
FORT JAMES CORPORATION, and)
GEORGIA-PACIFIC LLC)**

Plaintiffs,

v.

**NCR CORPORATION,)
INTERNATIONAL PAPER CO.,)
and WEYERHAEUSER CO.,)**

Defendants.

No: 1:11-cv-00483

Judge Robert J. Jonker

****EXPEDITED CONSIDERATION REQUESTED****

**PLAINTIFFS' MOTION FOR PROTECTIVE ORDER
AS TO RULE 30(b)(6) DEPOSITIONS NOTICED
BY DEFENDANTS NCR CORPORATION
AND INTERNATIONAL PAPER CO.**

Plaintiffs Georgia-Pacific Consumer Products LP, Fort James Corporation, and Georgia-Pacific LLC (collectively "GP"), by counsel and pursuant to Federal Rule of Civil Procedure 26(c) and 26(b)(2)(C), respectfully requests that this Court enter a protective order and quash Defendant NCR Corporation's ("NCR") March 14, 2012 Notice of Rule 30(b)(6) Deposition to GP for March 30, 2012 and Defendant International Paper Company's ("IP") March 13, 2012 Notice of Rule of 30(b)(6) Deposition to GP for March 29, 2012. The grounds for this motion are set forth in the accompanying Memorandum.

Pursuant to W.D. Mich. Local R. 7.1(e), GP requests that the Court give expedited consideration to this motion. The Rule 30(b)(6) depositions at issue are set to occur in just over

one week. Accordingly, the relief requested will become moot if briefed by the parties and considered by the Court in the ordinary course.

As required by W.D. Mich. Local R. 7.1(d), counsel for Georgia-Pacific states that it has conferred with counsel for NCR and IP and has made a good faith effort, without success, to resolve the matters at issue thereby necessitating the filing of this motion. Counsel for NCR and IP have declined to withdraw the notices of deposition subject to this motion .

Accordingly, for the reasons stated in the accompanying Memorandum, GP requests the Court enter a protective order quashing NCR's and IP's Rule 30(b)(6) notices of deposition to GP.

Dated: March 21, 2012

**GEORGIA-PACIFIC CONSUMER
PRODUCTS, LP., FORT JAMES
CORPORATION, and GEORGIA-PACIFIC
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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2012, I electronically filed PLAINTIFFS' MOTION FOR PROTECTIVE ORDER AS TO RULE 30(b)(6) DEPOSITIONS NOTICED BY NCR CORPORATION AND INTERNATIONAL PAPER CO. using the ECF system, which will send notification of such filing by operation of the Court's electronic systems. Parties may access this filing via the Court's electronic system.

FURTHERMORE, I hereby certify that on March 21, 2012, I served by electronic mail a copy of the aforementioned document upon counsel listed below:

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